CC Docket No. 98-67

From:

"Stephen Ehrlich" < steplich@xmission.com>

To:

"¡ENNIFER SIMPSON" <JSIMPSON@FCC.GOV>

Date:

7/10/02 3:11PM

Subject:

the relay explanation version

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Monday, July 8, 2002

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PRIMITAL COMMISSION COMMISSION OFFICE OF THE SECRETARY

Dear Ms. Simpson.

I am stephen Ehrlich from west Jordan, Utah. I am a TTY user and have used the TTY Relay Service for over a decade.

Kelli Toohill, telecommunication relay Specialist with Utah Public Service Commission first referred me to dana Jackson or Pam Gregory with Disability Section at your agency and also gave me your agency's toll-free voice phone number. I had tired to contact either one through the relay a number of times; and the Relay operators had informed me that the line was always busy and remained unreachable though. Kelli realized that all my attempts were futile and asked me to try you by e-mail. I hope that you are the right person to help us out with the initial phrase of the project which focuses on the need of revising the current standardized TTY relay Explanation version. If you are not, would you please help refer us to the right person who is willing to get involved in the project?

Since the context of the language in the current version is, indeed, ambiguous, confusing, misleading and vague, I would like to discuss some main points needed to clarify and improve the script. I am going to quote the existing version of the script to you, which I got from Kelli. It reads as:

The person on the line is using the relay service to communicate with you. The caller is typing their conversation, which will be read to you. You hear the words.)go ahead) It will be your turn to speak. Speak directly to the caller. Everything that will be heard will be typed to them. One moment for your call to begin.

Please let me make the comments on some sentences which may be needed to be clear and easy to be understood. In order to revise the version, the following goals are as:

- 1.. to help make the public aware of TTY users who are deaf or Hard of Hearing or deaf Blind or speech-impairment when the caller's true identity is revealed.
- 2.. to educate the public about the abbreviation and meaning of TTY as part of Deaf culture.
- 3.. to encourage and instruct hearing caller/respondent communicate with or speak directly to the TTY user through the Relay operator, not asking the relay operator to speak for the hearing caller/respondent to the TTY user.
- 4.. to eliminate the frequent usage of the third person in the relay process. The Tty users want to be treated as the first person to whom a hearing caller/respondent speaks directly through the relay operator.
- 5.. to promote and make reciprocal courtesy, equality and respect between a TTY user and a hearing caller/speaker. Parental or Patroning attitude upon the public should be removed.

No. of Copies rec'd List ABCDE First sentence: the person on the line is using the relay Service to communicate with you.

Comments: Many, many hearing respondents are not familiar well with the concept of Relay service when the relay operators explain to them for the first time. They do not know or understand the type of the relay service as well as the caller's status of hearing loss or speech impairment. The reason indicates that they have never had any experience contacting or interacting the person with hearing or speech impairment. The opening statement seems to confuse and mislead the hearing respondents about the unique nature of telecommunication in the relay process.

Recommendations:

- 1. If the macro is developed and set up for a TtY or voice carryover user's Customer database Profile by Relay telecommunication Service, the person's identity must be recognized with hearing or speech impairment. It would help a hearing caller/respondent direct communication better and effectively.
- 2. Insertion of the term TtY should be made into the relay service. It is very important that the public becomes aware of what telecommunication device a TTY user uses to call a hearing person via the relay.
- 3. Insertion of through the relay operator needs to be made after the phrase "communicate with you". Mentioning the phrase of through the relay operator will enable a hearing respondent recognize the operator as communication agent who helps facilitate the telecommunication process between these two parties without getting involved in their conversation.

Second sentence: the caller is typing their conversation, which is read to you.

Comments: this sentence might give the hearing respondent a false or wrong idea that both the Tty user and the relay operator are typing the message together at the same time. It is truly a complex implication in the usage of the possessive pronoun, that is, THEIr. In addition, it would lead the hearing caller/respondent to talk to the relay operator instead of the caller and then tell the relay operator to speak to the caller for her or him. It is a bad habit for the hearing person do the way, making an unintentional offense to the person with hearing loss. As a matter of fact the persons with hearing or speech impairment wants to be treated with direct communication from the hearing individual through certified professional sign language or oral interpreters or the relay operators; they do not want any hearing person tell the interpreter or the relay operators alike to speak for her or him.

What is even worst is that a Deaf or Hard of Haring caller who may use American sign Language as native language with limited proficiency in English can get confused about the possessive pronoun when the Relay operator is instructed to use the third person phrase instead of the first person by a hearing respondent.

Recommendation: the Possessive Pronoun should be changed from "their" to "her/his". It signifies that the TtY or voice Carryover user is typing or vocalizing her/his own message directly and independently through the relay operator. It is the best way to remove a hearing caller/respondent's awkwardness and fear to communicate with the person with hearing or speech impairment.

Third sentence: You hear the words.

Comments: It is not clear as to how a hearing caller/respondent hear the words...

Recommendation: the insertion of "from this caller through the relay operator who transmits her/his typewritten message into a voice message for you". This insertion would help a hearing person better

understand the basic concept of how the message is being transmitted in the relay process.

Fifth and sixth sentences: It will be your turn to speak. Speak directly to the caller.

Comments: these two sentences imply that a hearing caller/respondent is asked to speak to the caller directly without actually knowing which the caller the hearing person should communicate with -- the TTY user or the relay operator. The key problem which confuses the hearing caller/respondent stems from the second sentence above with improper possessive pronoun, that is, THEIr, instead of Her/HIs. It causes the hearing caller/respondent tell the Relay operator to speak to the TtY user for her/him; and that is how the TtY user feels offended with the relay operator's frequent usage of the third person phrase.

Recommendation: to capitalize the one and only sentence with strong and repetitive emphasis on "through the relay operator". Please let me illustrate the new sentence which reads as: It will be your turn to speak directly to the caller THROUGH tHE RELAY OPERATOr. The insertion of the capitalized phrase of through the relay Operator indicates that it will make the hearing caller/respondent realize that the relay operator serves as the Third party between these two parties and also change the hearing person's attitude towards the caller who is deaf or hard of hearing or deaf-blind or speech-impaired in terms of human relationship.

Seventh sentence: everything that is heard will be typed to them.

Comments; as you may see, the possessive pronoun at the end of the sentences obviously seems to be ambiguous and misleading. The term "their" may make the hearing caller/respondent think that the hearing person's spoken message is transmitted into the typewritten words to Both the TTY user and the relay operator together instead of to the TtY user through the relay operator.

Recommendation: the sentence be modied at the last word from "them" to this caller through the relay operator. As repeated, the hearing caller/respondent will then know that it is the Relay operator's job to transmit a message from spoken to typewritten to the TtY User as the first person in the relay process.

I want to make It clear to you again that I am trying to give you some constructive feedback about my perspective based on my long-time consumer experience of the unresolved problem of the existing script. I would like to make a proposal that the committee should be set up to review, study and revise or update the script which may simply be compatible with the varying mental comprehension of the average hearing callers with their diverse background throughout the United states. The committee may consist of a each representative from the following agencies:

- 1.. disability section from FCC
- 2.. telecommunication for the deaf Inc.
- 3. Phone carriers offering telecommunication relay Service such as Sprint, MCI and AT&t
- 1...some chosen state Public Service Commission such as Utah Public service Commission 2...

It is my feeling that the committee members will agree with me that it is about time that the script needs to be changed as long as they see fit. I assure you that they have much more professional expertise and knowledge in the filed of Relay service than I. They will do the job better to simplify and condense the

newly script. It is their only responsibly, neither the TTY user's nor the Relay operator's, to help the public in general to better understand and use the relay.

Before I am about to close this long letter, I need to make one more recommendation for the relay operators, both rookie and veteran. They find it monotous and tedious to "echo" or vocalize the relay explanation version repeatedly. Due to the human nature from work routine and stress their live voice tone and/or inflection may change at times -- unpleasant or hoarse or furious tough, etc. Sometimes it makes a hearing caller/respondent think that a TtY user is very rude while the user is not aware of the relay operator's voice tone due to her/his inability to hear. The individual macro for each of the relay operators should be set up in her/his own friendly voice tone with the revised Relay explanation version. It would be much easier for the operator to press the individual voice built-in macro key to automatically explain the relay version at a regular rate and make a hearing caller/respondent feel comfortable with the relay process. It will lessen the high turnover on the relay operators as employees. Naturally to say, the individual relay operator will again use her/his same live voice to speak to the hearing caller/respondent during the relay process following the macro.

Ms. Simpson, I hope that you are taking my proposal into consideration. It is about time for us to get started for the work with our goal towards better quality of telecommunication relay service. If there is any question, please do not hesitate to consult Kelli.

Thank you,

Stephen Ehrlich

Cc: Kelli toohill, telecommunication Relay Specialist with Public service commission of Utah

Mark A. tauscher, sprint Account Manager

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